

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GIRL SCOUTS OF THE UNITED STATES
OF AMERICA,

Plaintiff,
v.

BOY SCOUTS OF AMERICA,

Defendant.

Case No. 1:18-cv-10287 (AKH)

**NOTICE OF DEFENDANT BOY SCOUTS OF AMERICA'S
MOTION FOR RULE 37 SANCTIONS AGAINST PLAINTIFF
GIRL SCOUTS OF THE UNITED STATES OF AMERICA**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Boy Scouts of America's (the "BSA") Motion for Rule 37 Sanctions Against Plaintiff Girl Scouts of the United States of America, the Declaration of Sara Jenkins and the exhibits thereto, and all other documents of record, the undersigned will move before the Honorable Alvin K. Hellerstein, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order granting the BSA's motion for sanctions pursuant to Fed. R. Civ. P. 37(b) and (c) and seeking: (i) its reasonable attorney's fees and costs incurred as a result of GSUSA's actions; (ii) monetary penalties to discourage and deter such misconduct in the future; and (iii) such other relief as the Court deems just and proper.

Pursuant to Your Honor's Rule of Individual Practices 2.C, attached hereto please find a table of declarations and accompanying exhibits that will be filed in support of the BSA's motion.

Dated: December 31, 2020

Respectfully submitted,

By: Rachel Kassabian
Rachel Kassabian (*pro hac vice*)

rachelkassabian@quinnmanuel.com

Margret M. Caruso

margretcaruso@quinnmanuel.com

QUINN EMANUEL URQUHART & SULLIVAN, LLP

555 Twin Dolphin Drive 5th Floor

Redwood Shores, CA 94065

Telephone: (650) 801-5005

Facsimile: (650) 801-5100

Todd Anten

toddanten@quinnmanuel.com

QUINN EMANUEL URQUHART & SULLIVAN, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010

Telephone: (212) 849-7000

Facsimile: (212) 849-7100

Attorneys for Defendant Boy Scouts of America

Table of Declarations and Exhibits

1. Declaration of Sara Jenkins, dated December 31, 2020, with Exhibits A – AAA attached thereto.